

Exhibit C

PLAINTIFF'S PROPOSED VERDICT FORM

Ray Spencer's Fabrication of Evidence Claim

We, the jury, as to Ray Spencer's Fabrication of Evidence Claim, find as follows:

For Plaintiff Ray Spencer
and award damages in the
following amount(s):

For Defendant

Sharon Krause \$ _____

Michael Davidson \$ _____

Ray Spencer's Conspiracy Claim

We, the jury, as to Ray Spencer's Conspiracy Claim, find as follows:

(For each, check one and only one of the choices. For either Plaintiff or Defendant)

For Plaintiff Ray Spencer

For Defendant

Sharon Krause -- _____

Michael Davidson _____

The Total Value of Damages For
Ray Spencer's Conspiracy Claim:

\$ _____

INSTRUCTION: Sign this verdict form and notify the bailiff.

DATE: _____

Presiding Juror

Authority: 9th Circuit Manual of Model Civil Jury Instructions 3.3

Defendants' Objection: Defendants object to this proposed special verdict form because asking the jury to award separate amounts for each defendant under two separate causes of action invites an improper award of duplicative damages. Defendants' Special Verdict Form (modified) or, if necessary, Special Verdict Form (Supplemental-modified) properly lists the claims requiring resolution without inviting duplicative damages. Defendants also object to this proposed special verdict form because it does not ask the jury to resolve the questions of fact which the Court determined are necessary to decide whether qualified immunity applies. Defendants' Special Verdict Form (modified) or, if necessary, Special Verdict Form (Supplemental-modified) properly ask the jury to decide the factual issues that determine whether defendants are entitled to qualified immunity from liability.